

LONDON ENVIRONMENT STRATEGY

RESPONSE BY LONDON FORUM TO THE DRAFT STRATEGY PUBLISHED IN AUGUST 2017

London Forum of Civic and Amenity Societies is the umbrella body for 130 community groups across the capital. Our committees consider the extent to which London-wide policies and proposed London-wide policies meet the needs and aspirations of local areas, as well as the needs of London as a whole. Where necessary we submit comments on such policies and promote constructive suggestions which we believe would improve them. We hope the points we make in this response will all be taken into account in finalising the Environment Strategy and producing the London Plan.

London Forum welcomed the decision to produce a comprehensive Environment Strategy covering all aspects of London's environment. This draft appears to cover, in some form or other, all the issues London Forum identified as important in July in our statement to the Environment Committee of the London Assembly on the scope of the Environment Strategy. We also welcome the recognition that the Strategy should cover the period to 2050.

However, we are concerned to clarify the status of this Strategy in relation to the London Plan. The London Plan is an integral part of the statutory land use planning system. As we understand it the legal obligation on London boroughs to comply with the Mayor's policies generally relates only to the policies in the London Plan. Some matters will be covered both in the Environment Strategy and in the London Plan; and where that is the case the provisions in both documents must be consistent. In some other cases, however, it may be desirable to consider introducing appropriate provisions into the London Plan which could play an important role in buttressing policies in the Environment Strategy.

We support the Mayor's wish to make the Environment Strategy people-focused. We take the point that (page 19) this comprehensive strategy will for the first time provide an integrated framework within which individuals and organisations can seek to ensure their own actions will have the maximum beneficial impact on the environment. For example the Mayor might explore the possibility of major publicity campaigns to particular groups of London's population to set aspirational targets for individuals to reduce their water or energy use.

CONSULTATION QUESTIONS ON AIR QUALITY

1. *Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emission transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?*

London Forum is concerned that the wording of the draft strategy shows that the Mayor is dependent heavily on the Government having a strategy for reducing air pollution that will provide the framework for his own actions. The DEFRA strategy was not adequate, as described in London Forum's response to it at <http://tinyurl.com/y795v8q9>. Our draft of comments at <http://tinyurl.com/y8vd4zfe> to be sent to the Joint Select Committees scrutiny

on air pollution outlined the aims the Government, the Mayor and his Environment Strategy should have.

We strongly agree with the Mayor's direction of travel, but are concerned about both the slow pace and the lack of sufficient measures proposed.

On the pace, other cities, including Paris, Madrid, Athens and Mexico City proposed (late 2016) that diesels should be prohibited on the cities' roads by 2015, whereas the Mayor only proposes that all vehicles should be zero-emission by 2050 (Proposal 4.3.2d) and gives no specific date for banning diesel vehicles from London's roads. We think the Mayor should be working to a similar timescale to those other cities.

On the measures, the Mayor should include an early date for extending the ultra-low emission zone to outer, as well as inner London, beyond the North and South Circular Roads and charging all diesel cars and vans an emissions charge, including Euro 6 vehicles. It is wrong (see page 77 of the draft environment strategy) to say that pollution in areas such as around Heathrow and on the North Circular road is a matter of national policy and not for the Mayor: there is action that the Mayor should be taking irrespective of the decision on a Heathrow third runway.

Policy 4.3.1 for reducing levels of the particulates PM_{2.5} has a timescale of "as soon as possible". There must be a clear timeline of actions and targets. Proposal 4.3.2e is relevant and conclusions on reduction of particulates from tyres and brakes should be available by April 2018.

Proposal 4.3.4b to reduce particulates on the Underground is welcomed but an early report on causes that need to be addressed should be produced, with costs.

We think that the Mayor should be strongly encouraging (and incentivising) London boroughs to introduce differential parking charging based on local air quality emissions performance, as one obvious measure that they could now take, but which only a few boroughs are so far proceeding with. The experience of City of Westminster and LB Islington who are introducing such charges should be promulgated to others by a Best Practice Guidance issued by the Mayor. The New London Plan should support such charging by policy.

The strategy aims to achieve compliance with EU air quality limits as soon as practicable, which we welcome. But Brexit leaves it unclear how far the UK will adopt new EU air quality standards that have yet to be agreed (a separate point from the proposal in the Government's Repeal Bill for incorporating existing EU legislation). It was of concern that the House of Commons voted against New Clause 67 to the EU Withdrawal Bill. This clause aimed to ensure that environmental principles under Article 191 of the Treaty on the Functioning of the European Union would continue to apply in the UK after exit day. We think Mayor should be working to comply with new EU air quality standards as they are agreed as well as existing standards.

The Mayor may need additional powers to ban diesel trains from entering London.

2. *Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?*

Yes, these are welcome; but the more awareness is raised the more important it is for the Mayor to propose measures that match up to the problem.

If communities are to reduce their exposure to poor air quality as in Policy 4.1.1, the local air pollution should be a consideration by boroughs in planning decisions and that should be covered by a policy in the New London Plan, as in Proposal 4.1.1c.

3. *Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?*

Same answer as for 2 above.

4. *Would you support emergency measures, such as short-term road closures or vehicle restriction, during the periods of worst air pollution (normally once or twice a year)?*

Yes we would; but it needs to be made clear by the Mayor that such measures would not go very far in themselves in addressing the air quality problem.

5. *Do you agree with the proposed approach to reducing emissions from non-transport sources (including new buildings, construction equipment, rail and river vehicles and solid fuel burning)?*

Yes, we welcome the emphasis on this issue. But we think that the Mayor should make more specific proposals than are so far contained in the strategy. On emissions from trains and ships, the Mayor should use his existing powers, including on planning control for railway station buildings and docking facilities for ships, to incentivise good emissions performance.

CONSULTATION QUESTIONS ON GREEN INFRASTRUCTURE

1. *The Mayor's ambition is to make London a National Park City. What should the attributes of a National Park City be and what would we need to achieve for it to be considered successful?*

The promoter of the concept of a National Park City, Daniel Raven Ellison, National Park City says it is not about appropriating any planning powers or about obtaining public sector funding. Instead the National Park City Foundation now established, a registered charity, would draw in private funding to create and share ideas for community groups, schools, sports clubs and other organisations in order to better preserve and exploit the city's green space. Designation as a National Park City would be essentially a symbolic step.

The procedures and powers already exist to make London a greener city. They might need strengthening in certain respects, and they would now have a higher profile following designation of a National Park City. The criteria for the success of the National Park City would be the amount of money raised and spent by the Foundation from the private sector and the number of additional volunteers recruited and utilised effectively.

2. *In what ways can the Mayor help to ensure a more strategic and co-ordinated approach to the management of London's network of parks and green spaces?*

Green Corridors, the Greener City Fund, the Green Grid and creating green chains, as in Policy 2.18 of the current London Plan, are the keys to effective co-ordination. The Mayor should give them a much higher public profile, focusing on priority species and priority habitats. He should enlist the support of London boroughs and community groups to strengthen green corridors and should take the initiative in identifying any problems caused by local government boundaries and helping to resolve them.

Proposal 5.1.1d includes increasing the amount of green roofs but that should not reduce the opportunities for the use of solar panels to reduce dependency on energy from fossil fuels.

Yes, if the Mayor takes forward the policies and programmes energetically. A target date should be set in policy 5.2.1d ('The Mayor will work with key partners to establish a cost-effective monitoring framework...'); and policy 5.1.1c (which covers identifying area which should be greener and developing green infrastructure programmes) should be strengthened and target dates introduced where appropriate.

3. *Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?*

Yes. However, some boroughs are replacing broad-leaved street and park trees with flowering cherry and silver birch types to reduce the quantity of leaf fall that they have to collect during the Autumn and early Winter. Those policies should be reversed. London's forest areas should be protected and enhanced.

4. *How best can natural capital thinking be used to secure greater investment in the capital's green infrastructure?*

This would depend on identifying a particular situation in which a company or agency is willing to pay for a larger amount or higher quality of environmental services than have been provided hitherto. A simple example would be using environmental improvements to prevent flooding at a lower cost than constructing barriers or a relief channel. One method is the de-culverting of streams and rivers to create local flood plains.

CONSULTATION QUESTIONS ON CLIMATE CHANGE MITIGATION AND ENERGY

1. *Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050? Is the proposed approach and pace realistic and achievable?*

London Forum is concerned that the timescale for reducing emissions is not short enough and there are many dependencies.

Policy 6.1.4 for ensuring new developments are zero carbon is very important and should be a basis of decision for approval of new applications by the boroughs and by the Mayor. That would be expected as policy in the New London Plan.

2. *To achieve the Mayor's zero carbon ambition we estimate (between now and 2050), up to 100,000 homes will need to be retrofitted every year with energy efficiency measures. Do you agree with the Mayor's policies and proposals to achieve his contribution to this? What more can central government and others do to achieve this?*

We support Objective 6.1 but the changes in people's homes and places of work to achieve low emissions could need some incentives for replacing out-dated equipment and that would require Government financial support. In Proposal 6.1.1c the Mayor is going to "Make the case to Government to introduce the long-term regulatory and financial framework to support and speed up the rate of energy efficiency." Unfortunately, the Government has not yet indicated its policies for that.

The Mayor will have to decide how to achieve energy efficiency in homes in the Private Rented Sector and during housing estate renewal.

As Box 22 indicates, the home energy efficiency programme Re:New has achieved improvements in only 130,200 homes in the last eight years. That is only a little over 16,000 homes a year. The energy efficiency from better insulation can continue but more householders will have to be persuaded to implement solid wall insulation and use of the London Boiler Cashback Scheme.

The Government will need to support such schemes financially and to improve the energy efficiency of all its buildings in London, including those in the NHS.

London Forum agrees with the Mayor's policies and proposals for reduced emissions but London is entering a period of limited wage and salary increases but with higher living costs from inflation. For some time that could limit the number of householders able to afford to replace boilers.

3. *Which policies or programmes would most motivate businesses to reduce energy use and carbon emissions?*

The use of air and ground source heat pumps and district heating and cooling systems are important for new and existing commercial premises and could benefit buildings and homes around them. The Mayor should work with industry leaders to develop policies and projects.

There is opportunity to fit solar panels to many buildings in London and a programme should be developed for that. The draft solar action plan is welcomed.

Lights should not be left on in any office room not occupied.

- 4. Please provide any further comments on the policies and programmes mentioned in this chapter, including those in the draft solar action plan and draft fuel poverty action plan that accompany this strategy.*

It should be considered that electric vehicles could require eventually a 50% increase in the demand for electricity in London. That has to be dealt with by policy but it is not covered in this chapter.

CONSULTATION QUESTIONS ON WASTE

- 1. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?*

The priority should be to **significantly cut waste**, as in Policy 7.1.1

There is too much packaging on goods.

All plastic carrier bags and the use of 'soft' plastics should be banned in supermarkets and shops. They should offer paper bags, as in France and other countries.

People should be encouraged to carry string or cotton bags to hold goods purchased.

The Mayor's policies and proposals are satisfactory but a lot will depend upon the services of boroughs and the penalties they will apply when recycling facilities are not used.

- 2. Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?*

Yes. However, the services offered by boroughs are inconsistent and the Mayor should ensure the best facilities are used in all locations. Too much is dictated by the waste handling contractors that different boroughs and businesses use.

Best Practice Guidance on waste collection and disposal is required.

"Mixed plastics" are not being collected and that needs investigation. Most boroughs will collect as plastics only bottles and hard containers. The quantity of bubble-wrap, film and flimsy plastics is greater than that of hard plastics. That leaves householders with the

decision whether to take such materials to supermarkets that accept them as part of their own recycling methods or to put them into residual waste.

People are concerned that if they put soft plastics into residual waste, some may be dumped in landfill or all of it will be burned in incinerators. The contamination of our environment and atmosphere by both methods is wrong and Policy 7.3.2 and Proposal 7.3.2b apply. Councils should offer a soft plastics collection service and use the same recycling methods that supermarkets employ. The Mayor should investigate this.

To help people in blocks of flats to recycle, some Councils offer a mixed waste collection service using bags, rather than boxes. Some blocks of flats are provided with bins for each type of recyclable type of waste. There should be more consistency in such services and the Mayor should issue guidance.

There are now many houses in multiple occupation, with more than half a dozen families in one building. They should be treated similarly for waste to people living in flats to encourage recycling by methods that are simple, easy and do not take up space in homes. If not, then people in HMOs and some PRS properties are likely to deposit mixed waste in bins in the street on their way to shops or stations.

Proposal 7.2.1b should cover their requirements.

3. Do you think the Mayor should set borough specific household waste recycling targets?

Yes. It is necessary to increase recycling rates from 32% to 65% and to significantly increase recycling of business waste, which is understood to be around 16%. The higher targets will take too long to achieve unless penalties and incentives are applied.

4. What needs to happen to tackle poor recycling performance in flats?

See our response to question 2 in this section.

People in small flats and bed-sits need to get rid of waste frequently.

A service is desirable which collects mixed waste and food waste weekly and processes it through organisations which sort and process it. The Mayor's contract register of such companies (Proposal 7.2.1a) will assist boroughs to access such facilities but the charges to them for the sorting should be kept low by contracts negotiated by the Mayor.

Wherever possible there should be communal recycling, food waste and residual waste bins in the vicinity of flats. Those could be used by people living nearby in HMOs.

5. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?

Water taps to top up drinking containers are needed in all stations, shopping centres, parks and high streets.

A levy should be applied on all plastic water bottles, reimbursed when returned.

Coffee cups should be able to be treated as cardboard waste and there should be sections of waste bins marked in green in streets and at stations where they could be deposited just

as for newspapers. Councils are prepared to take TetraPaks as recyclable paper and card, so coffee cups should all be manufactured to be recyclable also.

6. *Please provide any further comments on the policies and programmes mentioned in this chapter.*

London Forum supports Policy 7.3.2 for reducing the climate change impact of waste activities and expects the Mayor to assess those impacts and initiate action to reduce them.

More local waste sites should be built to encourage householders to deposit metal, wood and other items not collected by Councils, as in Proposal 7.4.1a.

Waste companies collecting business waste must be required to phase out diesel lorries.

The degree to which energy from waste facilities meet the carbon intensity floor (Proposal 7.3.2b) should be monitored and included in borough annual monitoring reports.

CONSULTATION QUESTIONS ON CLIMATE CHANGE ADAPTATION

1. *Do you think the Mayor's policies and proposals are sufficient to increase London's resilience to climate change?*

Yes. Policy 8.1.2 for plans and indicators on climate change resilience will be important and relevant KPIs should be developed and reported upon in the Mayor's AMR.

2. *Do you agree with the Mayor's policies and proposals to make Londoners, more aware of the risks of climate change, like overheating in buildings and flooding following heavy downpours?*

Yes. However, the risks should be reduced by conditions with new planning approvals for sustainable urban drainage, water re-use, provision of tree cover and the use of natural ventilation.

Places where local flooding can occur should be identified across London in green areas adjacent to rivers. That includes the de-culverting of streams and rivers and creating flood areas and soakaways in suitable locations. Proposal 8.2.1a is supported strongly for this aim.

3. *Do you agree with the Mayor's policies and proposals to reduce water demand and leakages in London?*

Yes. The water mains renewal programme by Thames Water has slowed and should be continued at a faster rate. The sewer system should be used for fibre optic cables for digital services to avoid digging up roads and causing traffic congestion and associated pollution and heating.

Householders should be encouraged to switch to taps and shower heads which deliver less water and to install water butts.

Businesses should implement facilities for the re-use of 'grey' water.

4. *What do you see as the biggest opportunities to tackle climate change risks in London and how can the Mayor support this?*

Implementation of a new Thames barrier.

Provision of flood areas.

Sustainable urban drainage methods and greening.

Building of more reservoirs.

Cooling in the Underground.

Increasing shade in streets.

5. *Please provide any further comments on the policies and programmes mentioned in this chapter.*

Objective 8.4 for preparation for extreme heat events should be extended to cope with extreme cold events also.

CONSULTATION QUESTIONS ON AMBIENT NOISE

1. *Are there any other actions you think the Mayor should be taking to work with the boroughs and other key stakeholders to reduce noise?*

The noise from piling and other construction should be minimised.

Noisy buses should be replaced more quickly.

Owners of bars and restaurants should be encouraged to implement measures to reduce sound reflection by hard surfaces.

There should be carriages on trains and Tubes in which mobile phones are not to be used.

Noise from the Underground caused by the introduction of concrete sleepers should be reduced by buffering methods. Noise of trains crossing bridges should be reduced also.

2. *Do you think that the boroughs and the Mayor have sufficient powers to manage noise across London? If not, what additional powers are required and which organisation should hold them?*

Boroughs should be able to fine and prosecute any organisation which creates high levels of noise.

3. *Do you agree with the Mayor's policies and proposals to improve Londoners' awareness of the health risks of noise?*

Yes.

4. *Please provide any further comments on the policies and programmes mentioned in this chapter.*

Box 36 refers to the night time economy but has no policies or proposals for noise.

Proposal 9.1.1b encourages the transition to zero emission vehicles but electric vehicles would be silent and may need to emit sound to reduce the chances of road accidents. That is a dilemma for noise reduction.

It should be considered that electric vehicles could require eventually a 50% increase in the demand for electricity in London. That has to be dealt with by policy in section 6 of this strategy but it is not covered.

TRANSITION TO A LOW CARBON ECONOMY

London Forum supports the policies in this chapter.

London Forum agrees to the actions in chapter 11 relating to GLA Group operations.

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London Forum contact for this submission:

David Lewis (Trustee) drlewis27@yahoo.com 020 7738 9058